



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

February 21, 2008

Mr. Thomas Macchiarella, Code 06CA.TM  
Department of the Navy  
Base Realignment and Closure  
Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

**RE: Draft Remedial Investigation Addendum for IR Site 30, Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document, prepared by Bechtel Environmental, Inc., and submitted by the Navy on November 19, 2007. Overall, EPA agrees with the Navy's conclusions regarding Site 30, and also defers to DTSC's determination that the arsenic concentrations are indicative of a background population as per the State's guidance.

Our major concern with the RI Addendum is that the risks presented for soil are not reflective of current conditions at the site and do not factor in the mitigation resulting from the Navy's removal actions of 2004. We therefore request that the risk for soil at the site, including the calculations for risk from lead, be re-calculated to reflect the current, post-removal status of the site. It is important that not only the RI Addendum, but also the Proposed Plan and Record of Decision contain numbers for risk that are current.

We appreciate the opportunity to send you our comments on this document and look forward to resolving these last remaining issues in order to finalize the Remedial Investigation and move to the Record of Decision. Please call me at (415) 972-3029 if you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "Anna-Marie Cook", is positioned above the typed name.

Anna-Marie Cook  
Remedial Project Manager

Enclosure

cc list: Mary Parker, Navy  
Dot Lofstrom, DTSC  
John West, Water Board  
Peter Russell, Russell Resources, Inc.  
George Humphreys, RAB Co-Chair  
Karla Brasaemle, TechLaw Inc  
John Chesnutt, EPA

**EPA Review of the Draft Remedial Investigation Addendum  
for IR Site 30, Alameda Point**

**GENERAL COMMENT**

1. Please remove the use of the phrase “PRC pink background data” throughout the document and replace it with simply “pink background data”. It is not necessary or customary to designate a data set by the contractor who performed the work for the Navy.
2. Please revise the risk assessment to reflect current conditions at the site, i.e. one that does not include the data from the areas that were subject to removal actions such as the 5 ft x 5 ft x 2 ft soil removal around boring C3S030B068. This location contained the highest, and in some cases the only detectable, concentration of contaminants and the removal of the soil here dramatically reduces the site risk. To give a complete picture for anyone reading the RI addendum and the subsequent ROD it is critical that the risk be representative of current site conditions.

**SPECIFIC COMMENTS**

1. **Section 2.2, Page 2-2, last paragraph on page:** Please specify the depth to which soil was removed as part of the removal action (e.g. between 2 ft and 5 ft).
2. **Section 2.2, Page 2-3, end of last paragraph of section:** Were confirmation samples taken post removal action activities and, if so, what were the results? Please present this information here.
3. **Section 2.3.1, Page 2-3, second paragraph, last sentence:** Please replace the word “likely” with the word “possibly” since it is difficult to know from where any gravel may have been imported.
4. **Section 2.5.1, Soil, Page 2-5:** The text states “the Alameda Point background population for the central portion of Alameda Point (pink area) is not representative of background concentrations in the fill material at IR Site 30” and that the Alameda Point (pink area) background concentrations were “subsequently determined not to be applicable at IR Site 30”. We think that this wording is too strong and suggest a more accurate wording would be that “The Navy believes that the pink background data set is not representative of or applicable to Site 30.”
5. **Figure 2-4, Soil Sampling Locations:** In the center of the figure, to the east of Island High School in a 2004 Time Critical Removal Action area, there is a purple circle marker with a black dot in the center, which is not identified or defined in the figure legend. Please identify and define the marker in the figure legend.

6. **Section 2.6, Page 2-6, first bullet “Residential”:** Suggest being more specific with regard to inhalation of vapors and stating “inhalation of vapors from soil and groundwater in indoor and outdoor air, and...” Suggest the same changes for the “occupational” and “construction” bullets.
7. **Section 2.6, Page 2-6, paragraph after bullets, third sentence:** Suggest adding the phrase to the sentence as follows: “This summary does not discuss risks with potable groundwater use because the groundwater is not currently being used at the site; it is being addressed in the OU 5/IR02 groundwater remedial action; and water supplies for the school...”
8. **Section 2.6, Page 2-7, paragraphs at the top of the page:** As discussed in General Comment #2, it is essential to include the risk for lead and for the other contaminants post removal actions to give an accurate representation of current conditions at the site. Please revise these paragraphs to reflect the post removal/current risk.
9. **Section 3, Page 3-1, second to last sentence:** Both Site 30 and Site 31 were subject to DRMO activities in the past and EPA would prefer to see the phrase “unaffected by Navy activities” removed from this sentence.
10. **Section 3.2, first sentence:** Please revise to reflect that both Site 30 and Site 31 were subject to DRMO activities in the past. Storage of parts and scrap is not the same utilization as housing and therefore deserves mention here.
11. **Section 3.5, Lithology, Page 3-5; Section 3.6.4, Fill History and Lithologic Evaluation, Page 3-4; Appendix A, Executive Summary, Page ES-4, Lithology, Page ES-4; Appendix A, Section 5.2 Lithology, Pages 7 and 8; and Appendix A, Section 5.3, Physical Soil Characteristics, Pages 8 through 12.** Since IR Site 30 (and IR Site 31) were used by DRMO, it is possible that the gravel was placed in this area to prepare it for use as a storage yard. This would account for the difference in the relative percentages of sand, gravel, and fines at IR Site 25 and would also explain why gravel is found in the top four feet. The fact that Site 30 and 31 were used by DRMO should be included here.
12. **Table 2-1:** Please revise this table to reflect risk post removal action. The table as it stands now does not reflect current conditions at the site.